



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

MAY 07 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Article Number: 7005 3110 0000 5952 7412

Honorable Mayor Thomas Lankey
Edison Municipal Complex
100 Municipal Boulevard
Edison, New Jersey 08817

**Re: Request for Information
Docket No. CWA-IR-15-024
EPA Sanitary Sewer System Compliance Evaluation Inspection December 4, 2014
Borough of Edison
ICIS/NPDES No. NJP000361
NJDEP Program Interest ID No.96151 Sanitary System, NJDEP MS4 PID No. 190621**

Honorable Mayor Lankey:

Please find enclosed a Request for Information ("RFI") letter, which the U.S. Environmental Protection Agency ("EPA") Region 2 is issuing to the Borough of Edison ("Edison") pursuant to Section 308(a) of the Clean Water Act ("CWA"), 33 U.S.C. §1318(a). The EPA is issuing the RFI letter to require Edison to provide specific information regarding the findings of the enclosed inspection report.

Section 308(a) of the CWA, 33 U.S.C. §1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency is in violation of Section 301 of the CWA, 33 U.S.C. §1311 or carrying out section 402 of the CWA, 33 U.S.C. §1342, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the Clean Water Act, EPA may require the submission of information necessary to assess any facility/site and its related appurtenances for carrying out the provisions of the CWA.

On December 4, 2014, EPA conducted a Sanitary Sewer System Inspection of the Edison Sanitary Collection System. The enclosed inspection report lists potential non-compliance items as well as areas of concern, which are items that should be addressed to improve the operation and maintenance of the collection system. Additionally, the Middlesex County Utilities Authority ("MCUA") wastewater treatment plant ("WWTP"), which Edison discharges to, has had exceedances of its New Jersey Pollutant Discharge Elimination System ("NPDES") Permit and wet weather bypassing related to high wastewater flows during periods of wet weather. Based on a review of MCUA metering chamber data, Edison's flows to MCUA contains excessive inflow during wet weather.

REQUEST FOR INFORMATION

Edison is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. §1318(a), to submit the requested information regarding the subject construction site.

Within 45 calendar days of receipt of this RFI please submit:

1. in writing with the actions (including a schedule) that Edison has taken or will take to address: the potential non-compliance items and areas of concern identified in the enclosed inspection report;
2. the incident/bypass records for the period January 2012 to the Present that includes the names of the receiving waters for the incidents/bypasses;
3. a list of addresses and dollar amounts that were paid to residents/businesses as a result of claims due to Edison's sanitary sewer backups for the period January 2012 to present;
4. a written summary of how the pumps at the Tingley, Progress and Dogwood Pump Stations are protected from debris that could foul or damage the pumps.
5. the 2014 Municipal Storm Sewer System ("MS4") Annual Report along with a summary of the status of conducting Illicit Discharge Detection and Elimination inspection and necessary work at all Edison MS4 outfalls along with the status of any illicit discharges, if any, that have been detected.
6. Edison's most recent Infiltration/Inflow (I&I) Reduction Program required by MCUA and/or existing plans, cost estimate and schedules for Edison's I&I Reduction Program.
7. Specific targets for the volume of I&I removal per year.
8. The 4 most recent Infiltration/Inflow Reduction Program Reports that were sent to MCUA

CERTIFICATION

Any documents to be submitted by Edison as part of this Request for Information shall be sent by certified mail or its equivalent and shall be signed by an authorized representative of the respective entity (see 40 CFR §122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

All information required to be submitted pursuant to this RFI shall be sent by certified mail or its equivalent to the following addresses:

Larry Gaugler, NPDES Team Leader
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

Marcedius T. Jameson, Director
Water and Land Use Enforcement
New Jersey Department of Environmental Protection
Mail Code 401-04F, 401 East State Street
P.O. Box 420
Trenton, NJ 08625-0420

Should you have any questions regarding this request, feel free to have your staff contact Larry Gaugler, NPDES Team Leader at (212) 637-3950.

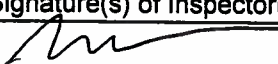
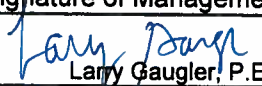
Sincerely,



Douglas McKenna, Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance

Enclosure

cc: Marcedius T. Jameson, Director, Water and Land Use Enforcement, NJDEP
Melissa Hornsby, NJDEP via email Melissa.Hornsby@dep.state.nj.us
Mike Waldron, Foreman - Edison, via email, waldron@edisonnj.org
Anthony Rotondo, NJDEP via email Rotondo Anthony.Rotondo@dep.nj.gov
Kevin Aiello, MCUA via email KAiello@MCUA.com

<input checked="" type="checkbox"/>	EPA	United States Environmental Protection Agency Washington, D.C. 20460 Water Compliance Inspection Report	Form Approved. OMB No. 2040-0057
Section A: National Data System Coding (i.e., PCS)			
Transaction Code		NPDES	yr/mo/day
		N J P 0 0 0 3 6 1	1 4 1 2 0 4 17
			18 &
			19
			20 1
Remarks			
2			
66			
Inspection Work Days		Facility Self-Monitoring Evaluation Rating	B1 QA
6 1 69		70	71 72 73 74 7
80			
Section B: Facility Data			
Name and Location of Facility Inspected (for industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time/Date	Permit Effective Date
Township of Edison, Department of Public Works, 7 Langstaff Ave. Edison, NJ, 08817		12/4/14; 8:15AM	
		Exit Time/Date	Permit Expiration Date
		12/4/14; 5:00PM	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Other Facility Data	
Mike Waldron, Foreman, Division of Sewer, Dept. of Public Works Barry Miller, Licensed Collection System Operator		NJDEP Sanitary Collection System ID No.96151 MS4 Permit Id No. 190621	
Name, Address of Responsible Official/Title/Phone and Fax Number(s)			
Jeff Roderman, Director Public Works, 100 Municipal Blvd. Edison NJ, 08817			
		Contacted	
		Yes x No	
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)			
	Permit	Flow Measurement	X Operations & Maintenance
	X Records/Reports	Self-Monitoring Program	X CSO/SSO (Sewer Overflow)
	Facility Site Review	Compliance Schedules	Sludge Handling/Disposal
	Effluent/Receiving Water	Laboratory	Pretreatment
			Storm Water
			Pollution Prevention
			Multimedia
			Other:
Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)			
See attached compliance evaluation inspection report for inspection findings.			
Name(s) and Signature(s) of Inspector(s)		Agency/Office/Phone and Fax Numbers	Date
 Murray Lantner, P.E.		EPA/DECA-WCB/(212) 637-3976 FAX: 3953	8/8/15
Signature of Management Q/A Reviewer		Agency/Office/Phone and Fax Numbers	Date
 Larry Gaugler, P.E. Chief NPDES Team		EPA/DECAWCB (212) 637-3950, Fax 212 637-3953	5/6/15

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc. (Use the Remarks columns to record the State permit number, if necessary)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	I	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge - Biosolids	{	Storm Water-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Storm Water-Construction-Non-Sampling
F	Pretreatment (Follow-up)	\$	Combined Sewer Overflow-Non-Sampling		Storm Water-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling		
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling		
J	Complaints	\	CAFO-Sampling		
M	Multimedia	=	CAFO-Non-Sampling		
N	Spill	2	IU Sampling Inspection		
O	Compliance Evaluation (Oversight)	3	IU Non-Sampling Inspection		
P	Pretreatment Compliance Inspection	4	IU Toxics Inspection		
R	Reconnaissance	5	IU Sampling Inspection with Pretreatment		
S	Compliance Sampling	6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics with Pretreatment		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A	State (Contractor)	O	Other Inspectors, Federal/EPA (Specify in Remarks columns)
B	EPA (Contractor)	P	Other Inspectors, State (Specify in Remarks columns)
E	Corps of Engineers	R	EPA Regional Inspector
J	Joint EPA/State Inspectors—EPA Lead	S	State Inspector
L	Local Health Department (State)	T	Joint State/EPA Inspectors—State lead
N	NEIC Inspectors		

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal, Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952
- 2 — Industrial, Other than municipal, agricultural, and Federal facilities
- 3 — Agricultural, Facilities classified with 1987 SIC 0111 to 0971
- 4 — Federal, Facilities identified as Federal by the EPA Regional Office
- 5 — Oil & Gas, Facilities classified with 1987 SIC 1311 to 1399

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors, any effort for laboratory analyses, testing, and remote sensing, and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

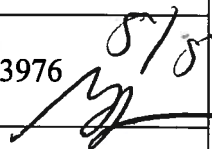
Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, DECA-WCB
20th Floor, 290 Broadway, NY, NY 10007

SANITARY SEWER SYSTEM
COMPLIANCE EVALUATION INSPECTION REPORT

Compliance Evaluation Inspection: Township of Edison, NJDEP Program Interest ID No.96151 Sanitary System NJDEP MS4 PID No. 190621 EPA ICIS No. NJP000361
Inspection Date: December 4, 2014 Inspection Time: 8:15AM – 5:00PM
EPA Inspector: Murray Lantner, P.E. Environmental Engineer, EPA Region 2, DECA-WCB (212) 637-3976 
On-Site Representatives: Mike Waldron, Foreman Barry Miller, Licensed Collection System Operator
Site Information: Jeff Roderman, Director Public Works, 100 Municipal Blvd. Edison NJ, 08817
Precipitation Information: New Brunswick NJ – 0.00” on 12/4/14, 0.21” on 12/3/14; and 0.14” on 12/2/14 http://www.njweather.org

I. Introduction

1. EPA conducted a Sanitary Sewer System Compliance Evaluation Inspection (“CEI”) on December 4, 2014 of the Township of Edison’s (“Edison’s”) Sanitary Sewer System.
2. Edison’s population is about 100,000 people and covers about 32 square miles.
3. Edison operates a 100% separate sanitary sewer system. It includes 21 sanitary pump stations and 1 stormwater pump station. The sanitary sewer system is approximately 396 miles with 75 miles of force mains. The sanitary sewer pipes date back to 1962 and range in diameter from 8” to 42” constructed from Tile, PVC, Reinforced Concrete, VCP, Asbestos Cement Pipe (“ACP”). ACP was said to be subject to hydrogen sulfide corrosion. Manhole spacing was said to be approximately every 150’.
4. Representatives said that they have been implementing Inflow and Infiltration (“I&I”) reduction for the last few years by slip lining pipes and installing manhole inserts at Barlow Road (See map in photo 2405) where major I&I was noted. When they conduct manhole inspections if they see problems they said it will be fixed. But not necessarily looking for I&I throughout the system. Edison is not conducting smoke testing to find illicit stormwater connections. Representatives explained that there was \$8M that will be used of over the next 4 to 5 years to conduct I&I work.

5. Representatives explained that there is a local ordinance against sump pump connections to the sanitary sewer. Typically Edison representatives will request that sump pumps be disconnected during home inspections when the house is being sold.
6. Representatives explained that they have a list of known trouble spots where they conduct weekly checks and monthly checks and conducting cleaning/jetting in these locations.
7. Edison conducts area flushes based on their card system (See Cards in Photo 2408) which identifies problem locations. They explained that in summertime they try to do maintenance of certain areas like maintenance of the right of way. Edison representatives said that they clean about 100 miles of sanitary sewer per year about (25 to 30% of sewer system). Sewers are cleaned by jetting the sewer. They also have a contractor conducting foaming of sewers in areas with high root problems. Edison is also requiring new homes to pull trees back from easement to reduce foot infiltration.
8. Edison has a CCTV truck that is used in response to specific problems and is not part of a routine CCTV effort in the collection system. Estimate that approximately 1% of the system is CCTV'd per year.
9. Town Code Enforcement was said to inspect grease traps at new restaurants. City health inspectors checks restaurants and this inspection includes grease traps.
10. The Borough Metuchen sanitary flows enter into the Edison sanitary sewer system. But Metuchen is billed by MCUA directly.
11. Map of system. Edison sanitary sewer map is available in paper and electronic format (See Photo 2405, Attachment 1).
12. Edison has 21 pump stations (see list in Attachment 2) several of the pump stations pump to the East Side or West Side Pump Stations. All pump stations are said to be alarmed with high level alarms, low level, power failure, pump failures, generator running in some. When an alarm goes off the police get a call as do collection system personnel.
13. 11 out of 21 stations have emergency generators (9 diesel and 2 natural gas). Edison has two tow behind generators. Edison has vendors under contract to rent generators when extreme events occur. Edison has a 6" portable pump and 8 pump stations set up for bypass pumping. There may be a need in Edison to have additional generators and backup pumping. Edison explained that their capital plan included additional generators.
14. Edison explained that they conduct flow monitoring on National Road and Evergreen. They said that they have circular chart at pump stations.
15. Sewer bills are based upon water consumption, but sewer bills are reduced 15% off for pools and sprinklers. This is done through the billing department, bills were not available.

II. Summary of Potential Noncompliance and Areas of Concern

A. Potential Noncompliance

1. Edison said that they have had Sanitary Sewer Overflows (“SSOs”)/spills in the past 5 years and said that they have kept 5 years of records. Discharges of sewage to surface waters without a Permit does not conform with Section 301 of the Clean Water Act. During the inspection records were not available (pre 2014) since the holder of the records, Mr. Ellmeyer, was not available for the inspection. Please provide the incident/bypass records for the period Jan 2012 to the Present. Additionally, the name of the receiving waters does not appear to be listed on the reports. Edison must ensure that the spill reports include a list of the receiving waters. Incident reports were available in NJDEP Data Miner See Attachment 4.
2. As shown in the spill reports in Attachment 4 compiled from NJDEP Data Miner (http://datamine2.state.nj.us/DEP_OPRA/OpraMain/get_long_report?) for the period November 19, 2009 to the Present March 3, 2014, there were spills reported on 1/13/10, 3/4/10, 7/29/10, 4/29/11, 5/19/11, 6/20/11, 10/16/14. Note that there were no spill records during the period of Hurricane Sandy when there were manholes said to be overflowing on and after October 29, 2012.

B. Areas of Concern:

3. NJDEP issued a Notice of Violation dated October 8, 2014 (Attachment 3), some of these issues were discussed with Edison representatives during the inspection as described below:
 - a. Tingley, Progress, and Dogwood Pump Stations (“PS”) were identified as not having any screening in place. Edison representatives explained that these stations were built in 1980s and originally designed with manually cleaned bar screens. Representatives explained that the cleaning of these screens was causing problems and that each of the pump stations are in series, where sewage is pumped from the Progress PS to Tingley PS to Dogwood PS to the West Side PS which is equipped with comminutors. Edison should provide information on how the pumps at the Tingley, Progress and Dogwood Pump Stations are protected from debris that could foul or damage the pumps.
 - b. At the Dogwood PS (PS No. 5) the suction gate valve on pump No. 3 is broken and as a result this pump has been out of service since February 22, 2012. Representatives explained that the problems at the Dogwood PS will be corrected as part of a Capital Improvement (for Tingley, Progress, and Dogwood PSs) within 3 to 5 years. Edison representatives explained that 1 pump at Dogwood could handle all of the flow. Edison should verify the schedule for fixing suction valve on Pump No. 3 at the Dogwood PS and the schedule for the capital improvements at the Progress, Tingley and Dogwood Pump Stations and whether the upgrades will include screens or comminution at these 3 pump stations.

- c. The NOV identified a failure to submit reports after incidents. Edison representatives reported there were manhole overflows during Sandy that may not have been reported. Edison must report all instances where there are overflows of sewage or other illicit discharges to its MS4 and/or surface waters from its sanitary sewer system or from private laterals and also report those or from private laterals to the MS4 or surface waters.
- 4. Hayduck PS – Edison representatives said that a starter was replaced on the emergency generator recently. The pump station was said to serve just 3 houses and they said that a seal on a pump was needed. One of the two pumps at the station is running and the other pump will be removed and sent for a seal replacement. Probably be in the next couple of weeks. What is the operational status of the pumps at this pump station?
- 5. As described in paragraph I.12 above, there may be a need in Edison to have additional generators and backup pumping. Edison explained that their capital plan included additional generators. Please provide Edison's capital plan for its sanitary sewer system and pump stations.
- 6. Edison does not have written procedures to respond to overflows and spills. But in responding to calls they said that they determine the problem, fix the problem, and file a report. They said they notify the spill hotline if necessary. Sewer representatives don't go into private basements/houses to respond. They explained that if there is a spill on the road they will dilute with water (tank truck) pick up any paper and place lime on grass. If there is spill to a catch basin they will isolate with sand or sand bags and vacuum it out. EPA recommends that these protocols be written into Standard Operating Procedures ("SOPs") and incorporated into training programs for new staff.
- 7. Edison said that they have insurance for its collection system. Information on claims can be obtained from the Benefits Coordinator (Kathie Belfiore) 732 248 7376. Edison must submit a list of addresses and amounts that were paid out as a result of backups due to Edison's sanitary sewer for the period January 2012 to present.
- 8. Edison reported that there are capacity issues during torrential downpours, perhaps once per year. Records were said to indicate this issue. Edison should provide the locations of where there are capacity issues during heavy rain events and provide the steps that will be implemented to correct this issue.
- 9. Edison does not keep of log of when the emergency generators for the pump station are tested. EPA recommends keeping a pump station log book or log sheet that includes this information.
- 10. The Collection System Monthly Reports in 2014 were initially based on complaints that took place during the day shift only. It did not include calls that came in after the end of the day shift. Edison must ensure that its collection system monthly reports include the complaints/sewer backups 7 days per week 24 hours per day. Edison provided revised

Collection System Monthly Reports for the period Jan 2014 to Oct. 2014 following the inspection in 2014 that included the additional sewer backups.

11. EPA recommended that the location of blockages of Edison's sanitary main lines be entered into a GIS system or spreadsheet with different column for address and street and if possible a summary of the cause of blockage, so Edison can identify problem areas that require additional inspection/cleaning and/or repair work.
12. Evergreen (East Side) PS (PS No. 6) – Pump No. 2 was out of service because the shaft needs rebalancing (See unused motor in Photo 2443, Att. 1). The Variable Frequency Drive ("VFD") on Pump No. 1 was not functioning and the pump is operated at a fixed speed as the lag pump. The lights in the downstairs area of the dry well weren't working. The comminutors (muffin monsters) were not working (see photos 2444 and 2445) and the flow was going through the manual bar screens and not through the comminutors. The pump station logbook indicates that the muffin monster needed to be sent out [for repair] on Nov. 24, 2014 (Photo 2446). What is the operational status of Pump No. 2, the VFD on Pump No. 1, the lights and comminutors at this Pump Station and if not currently working when will they be brought back into service.
13. Tingley Pump Station (PS No. 17) – Based upon the collection system monthly reports for the period January to Oct. 2014 the check valve on Pump No. 2 is in need of replacement. What is the current status of Pump No. 2 and if not in service, what is the schedule for bringing it back into operation.
14. Metuchen Heights ("Metuchen") Pump Station – The ventilation system at this station was not operating. The station has had problems with rags and grease. As documented by the record in photo 2420, clogging of the pumps was noted on Feb. 21, 2014. Is there a schedule for upgrades of this pump station? If so please provide the schedule.
15. Oxford PS – had a pump blockage on Feb. 21 and March 29, 2014 as documented in the records in photos 2420 and 2430.
16. Progress pump station – Edison representatives reported that they have had grease problems in the past.
17. As documented in the record in Photo 2425 there appears to have been a sanitary sewer overflow at Rt. 1 South Ultimate Collision on March 12, 2014. Was there an SSO and was this reported?
18. The Municipal Storm Sewer System ("MS4") Annual Report and information on the Illicit Discharge Detection and Elimination ("IDDE") program was not available during the inspection. Jeff Roderman director of public works would have this information. Edison said that an outside contractor was hired to do the IDDE work. Please provide the MS4 annual report for 2013 and 2014 to EPA along with a summary of the status of conducting IDDE work at all Edison MS4 outfalls.

19. Section 5(I) of the Participant Supplemental Agreement (Attachment 4) with MCUA states, "Infiltration/Inflow – Each Municipality and all public corporations discharging sewage into the Local Sewerage System of a Municipality will maintain its Local Sewerage System in such a manner as to exclude any excessive infiltration and/or inflow from entering into the Local Sewerage System." As shown in Table 1 below several MCUA metering chambers that receive Edison sanitary flows show a 2.5x increase (Flow difference 150% or greater than dry weather flows) in wet weather flows. Edison must include measures in its MCUA mandated I&I reduction plan to eliminate excessive I&I from its sanitary system. Also please note that MCUA's CSO Permit, described below, will require MCUA to implement MCUA to control excessive I&I in its satellite systems.
20. Part IV.F.1.h of MCUA's NJPDES Permit NJ0020141 which will take effect on July 1, 2015 requires that the permittee (MCUA) shall review its rules, ordinances, and/or its sewer use agreements and create an anticipated schedule to revise them within 6 months of the Effective Date of the Permit (EDP) if necessary. In general, this schedule shall not extend beyond the due date for the LTCP as per Part IV.D.3.b.iv of the Permit. This schedule shall require the customer municipalities to:
- i. operate and maintain their treatment works,
 - ii. identify I/I and reduce it to meet the definition of non-excessive infiltration (in combined and separately sewered areas) and non-excessive inflow (in separately sewered areas) where both terms are defined in N.J.A.C. 7:14A-1.2, and
 - iii. identify and eliminate interconnections and cross-connections in storm sewers.
21. "Nonexcessive infiltration" means the quantity of flow which is less than 120 gallons per capita per day (domestic base flow and infiltration) or the quantity of infiltration which cannot be economically and effectively eliminated from a sewer system as determined in a cost-effectiveness analysis. For domestic treatment works receiving wastewater from combined sewers, nonexcessive infiltration means the quantity of flow attributable to infiltration during dry weather shall be less than 40 gallons per capita per day (gpcd) or 1,500 gallons per day per inch diameter per mile of sewer.
22. "Nonexcessive inflow" means the maximum total flow rate during storm events which does not result in chronic operational problems related to hydraulic overloading of the treatment works or which does not result in a total flow of more than 275 gallons per capita per day (domestic base flow plus infiltration plus inflow) during a significant rainfall event which causes surface ponding and surface runoff. Chronic operational problems may include surcharging, backups, bypasses, and overflows.
23. Based on the threshold of 275 gallons per capita per day (gpcd) and Edison's population of 100,000 flows above 27.5 MGD exceed the nonexcessive inflow threshold. As shown in Table 3 below based upon data in MCUA's I&I reports for the period 2011 to 2014, during significant rainfall events, total flows in Edison's separate exceeded the 27.5 MGD threshold for non excessive inflow in 2011, 2012, 2014.

Table 1: MCUA metering chambers in Edison comparing maximum wet weather/dry weather flow difference in 2011 to 2014 – data submitted to EPA by MCUA

Participant	Connnection	2011 Max Difference (MG) between wet and dry weather flows (MG)	2011 Max Percent Difference for those 150% Greater (%)	2012 Max Difference between wet and dry weather flows (MG)	2012 Max Percent Difference for those 150% Greater	2013 Max Difference between wet and dry weather flows (MG)	2013 Max Percent Difference for those 150% Greater	2014 Max Difference between wet and dry weather flows (MG)	2011 Max Percent Difference for those 150% Greater (%)
Edison	Cedar Lane	5.561	625	1.891	191	4.793	518	3.913	445
Edison	Clara Barton	6.114	284	2.748	117	6.082	263	5.188	234
Edison	Johnson Park	18.494	343	8.167	144	20.151	383	15.959	299
Edison	Pershing Ave.	1.851	413	1.504	303	1170	188	1.821	286
Edison	Raritan Center	0.294	88	0.104	34	0.694	293	1.158	500
Edison	Silver Lake	7.325	291	2.329	97	3.920	172	3.728	184

Table 2: Based on Edison's Revised Collection System Monthly Reports from Jan. to Oct 2014 submitted Dec. 2014, and then numbers were multiplied by 1.2 to reflect an annual number since we had only 10 months of data. 2012 based on summary of collection system monthly reports from MCUA.

Year (Collection System Monthly Reports)	Number of Mainline Blockages Per Year	No. of Blockages/100 miles per year (396 mile system)	No. of Lateral Blockages Per Year	No. of Miles of Sewer Cleaned Per Year	Percentage of System Cleaned in Year	Miles of System Televised	Percentage Televised Per Year
2014 based on Jan. to Oct.2014 *	66	16.7	122	92.8	23.4%	1.9	0.5%
2012	40	10.1		88.7	22.4%	2.8	

*2014 data provided was Jan to Oct. 2014 and then these results were multiplied by 12/10 to extrapolate the data for a 1 year period.

Table 3: Flows during large precipitation events at Edison's MCUA Metering Chambers 2011 to 2014 based on MCUA Annual I&I data.

MCUA Metering Chamber	Flow 4/3/14 During 3.01" Rain Event (MGD)	Flow 6/7/13 during 2" rain Flow (MGD)	Flow During 1/13/12 (0.73" rain event) (MGD)	8/14/11 Flow During 5.77" rain event (MGD)
Cedar Lane	4.503	5.719	2.47	5.37
Clara Barton	7.304	8.391	5.09	4.37
Johnson Park	13.098	25.419	13.84	21.97
Pershing Ave.	2.458	0.689	0.72	0.993
Raritan Center	0.513	0.423	0.37	0.413
Silver Lake	4.787	6.198	3.6	6.14
Total Edison Flow MGD	32.663	46.839	26.09	39.256

24. Part I.F.6.b.iii of the NJDEP Tier A Municipal Separate Storm Sewer System Permit requires that, "annual certifications shall also include the number of outfalls physically inspected, the number of outfalls found to have dry weather flow, the number of illicit connections found and the number of illicit connections eliminated. Copies of inspection reports shall be submitted with the annual certification for those outfalls found to have dry weather flow." Edison sanitary system representatives did not have this information and said that Jeff Roderman, Director of Public Works would have this information.

III. Field Work

1. During the field portion of the inspection the EPA inspector visited the Oxford, Metuchen Heights (Metuchen), Evergreen (East Side), Progress and Dogwood Pump Stations. Areas of Concern from these pump stations are listed above in the Areas of Concern section of the report.
2. We also inspected manholes where there have been past problems:
 - a. Inman Ave. – Burger King (where some grease was seen in sewer, but sewer was flowing normally) see Photo 2438;
 - b. 680 Old Post Road (Sewer down and running)
 - c. 24 Waverly at Carlisle (where some debris was seen in the sewer) but sewer was down and running (See Photo 2448); and,
 - d. 126 Hillcrest (sewer was down and running)

IV. Closing Conference

A closing conference was held with an Edison representative to discuss many of the findings that were identified during this inspection.

V. Attachments

1. EPA Photos
2. Edison List of Pump Stations
3. NJDEP NOV to Edison (10/8//14)
4. NJDEP Incident Reports for Edison related to Sewage Spills
5. Collection System Monthly Reports – Example January. 2014
6. Example Supplemental Participant Agreement with MCUA – Page 5 – I&I

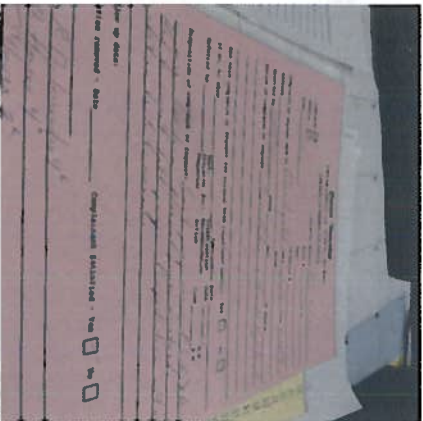
C:\Users\Mlantner\Documents\My_Documents\My\My_Documents\EPA\insp
2013\mcua\MCUA Satellites\Edison\Edison 2015 SSO CEI.docx

ATTACHMENT 1 – Edison SSO Inspection December 4, 2014, Unedited Digital Photographs Nikon Coolpix P510, Murray Lantner, P.E. Env. Eng. EPA Region 2, DECA-WCB	
Photolog	Description
DSCN2405	Portion of Sewer Map showing Barlow
DSCN2406	
DSCN2407	
DSCN2408	Cards with locations for more frequent cleaning
DSCN2409	Various records and report from Edison
DSCN2410	
DSCN2411	
DSCN2412	
DSCN2413	
DSCN2414	
DSCN2415	
DSCN2416	
DSCN2417	
DSCN2418	
DSCN2419	
DSCN2420	Feb. 21, 2014 problem at Metuchen Heights PS
DSCN2421	Various records and report from Edison
DSCN2422	
DSCN2423	
DSCN2424	
DSCN2425	
DSCN2426	
DSCN2427	
DSCN2428	
DSCN2429	
DSCN2430	
DSCN2431	
DSCN2432	
DSCN2433	Metuchen Pump Station wet well
DSCN2434	Manually cleaned Bar Rack at the Metuchn Pump Station – said cleaned 4 times per week
DSCN2435	Manually cleaned Bar Rack at the Metuchn Pump Station – said cleaned 4 times per week
DSCN2436	Pumps at Metuchen PS
DSCN2437	Manhole upstream of the Metuchen PS – some grease seen in the manhole
DSCN2438	Some Grease in manhole on Inman Ave./ Burger King – sewer was flowing well.
DSCN2439	Manhole Inman Ave. near Burger King
DSCN2440	Progress PS wet well debris seen on ladder and grates
DSCN2441	Progress PS wet well debris seen on ladder and grates

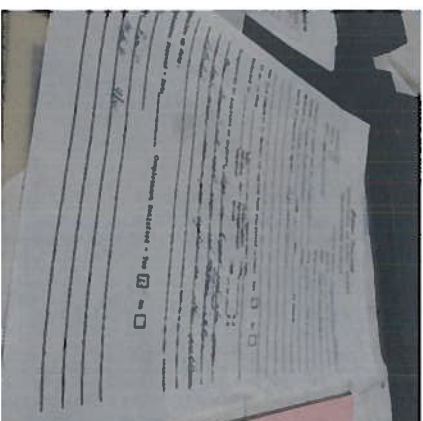
DSCN2442	Manhole where a sanitary sewer overflow to a stormwater pipe was sealed years ago.
DSCN2443	Evergreen/East Side Pump Station – Motor for pump that is not in use due to shaft issue.
DSCN2444	Comminutor's at Evergreen (East Side Pump Station) Out of service
DSCN2445	Comminutor's at Evergreen (East Side Pump Station) Out of service
DSCN2446	Log entry for Nov. 24, 2014 at the Evergreen (East Side Pump Station) that shows that the muffin monster needs to be sent out.
DSCN2447	Photo of plaque at the Evergreen (East Side) PS
DSCN2448	Manhole at 24 Waverly (Waverly and Carisle) some debris show in sewer.
DSCN2449	Street sign at Waverly and Carlisle.

Attachment 1 - Unedited Digital Photos, M. Lantner, Env. Eng.
EPA Reg. 2, DECA-WCB Nikon Coolpix P510 Camera, Edison NJ

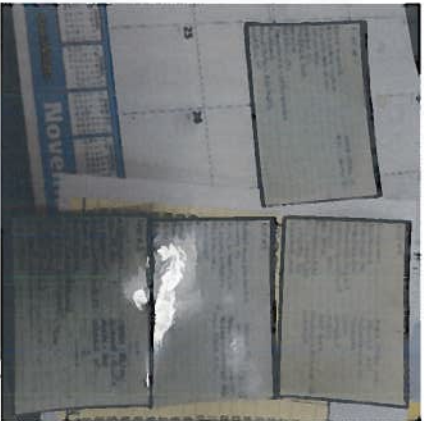




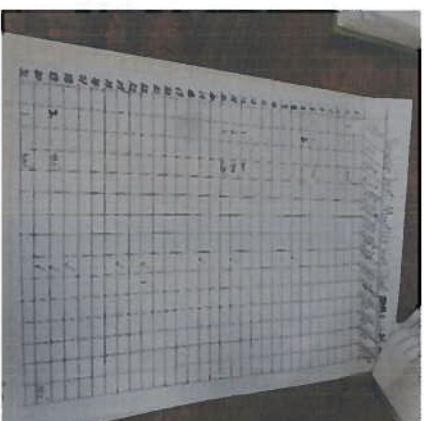
DSCN2406



DSCN2407



DSCN2408



DSCN2409

Form 1040
 (2019) U.S. Individual Income Tax Return

Personal Information

Name: _____
 Social Security Number: _____
 Date of Birth: _____
 Filing Status: ☐ Single ☐ Married Filing Jointly ☐ Married Filing Separately ☐ Head of Household

Employer Information

Employer Name: _____
 Employer Address: _____
 Employer Phone: _____

Income

Wages, salaries, tips, etc.: _____
 Dividends and capital gains: _____
 Interest income: _____
 Rental income: _____
 Other income: _____

Adjustments to Income

State and local taxes: _____
 Charitable contributions: _____
 Other adjustments: _____

Tax

Estimated tax: _____
 Total tax: _____
 Refund: _____

DSCN2423

Form 1040
 (2019) U.S. Individual Income Tax Return

Personal Information

Name: _____
 Social Security Number: _____
 Date of Birth: _____
 Filing Status: ☐ Single ☐ Married Filing Jointly ☐ Married Filing Separately ☐ Head of Household

Employer Information

Employer Name: _____
 Employer Address: _____
 Employer Phone: _____

Income

Wages, salaries, tips, etc.: _____
 Dividends and capital gains: _____
 Interest income: _____
 Rental income: _____
 Other income: _____

Adjustments to Income

State and local taxes: _____
 Charitable contributions: _____
 Other adjustments: _____

Tax

Estimated tax: _____
 Total tax: _____
 Refund: _____

DSCN2425

Form 1040
 (2019) U.S. Individual Income Tax Return

Personal Information

Name: _____
 Social Security Number: _____
 Date of Birth: _____
 Filing Status: ☐ Single ☐ Married Filing Jointly ☐ Married Filing Separately ☐ Head of Household

Employer Information

Employer Name: _____
 Employer Address: _____
 Employer Phone: _____

Income

Wages, salaries, tips, etc.: _____
 Dividends and capital gains: _____
 Interest income: _____
 Rental income: _____
 Other income: _____

Adjustments to Income

State and local taxes: _____
 Charitable contributions: _____
 Other adjustments: _____

Tax

Estimated tax: _____
 Total tax: _____
 Refund: _____

DSCN2424

Form 1040
 (2019) U.S. Individual Income Tax Return

Personal Information

Name: _____
 Social Security Number: _____
 Date of Birth: _____
 Filing Status: ☐ Single ☐ Married Filing Jointly ☐ Married Filing Separately ☐ Head of Household

Employer Information

Employer Name: _____
 Employer Address: _____
 Employer Phone: _____

Income

Wages, salaries, tips, etc.: _____
 Dividends and capital gains: _____
 Interest income: _____
 Rental income: _____
 Other income: _____

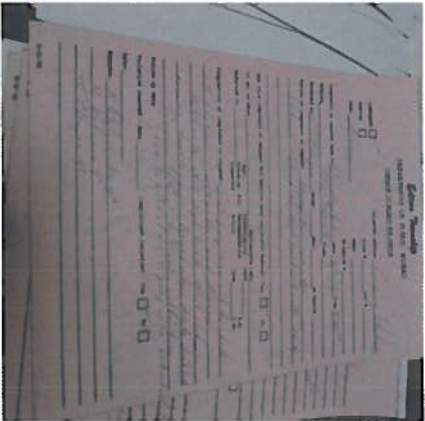
Adjustments to Income

State and local taxes: _____
 Charitable contributions: _____
 Other adjustments: _____

Tax

Estimated tax: _____
 Total tax: _____
 Refund: _____

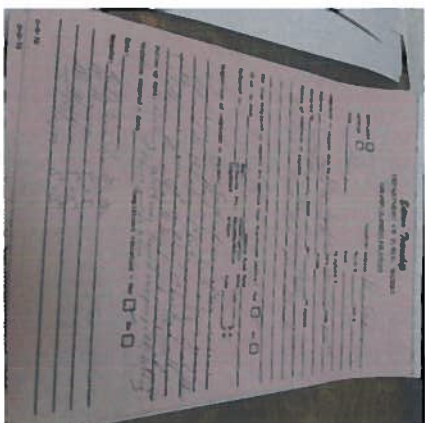
DSCN2426



DSCN2431



DSCN2433



DSCN2432



DSCN2434



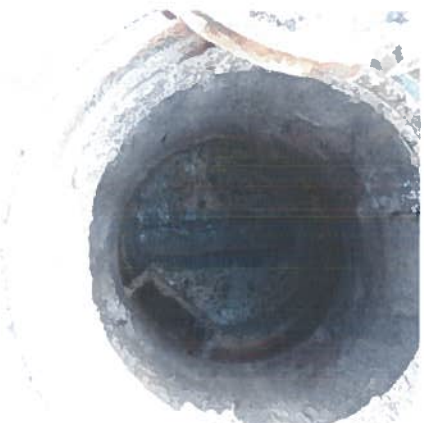
DSCN2435



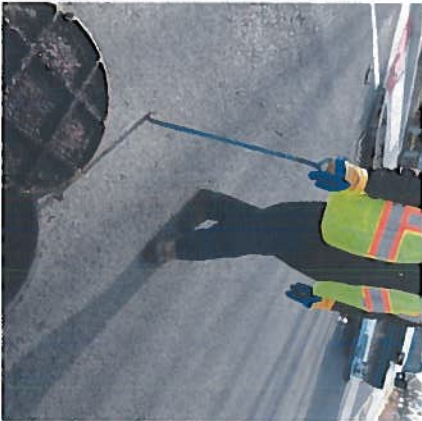
DSCN2437



DSCN2436



DSCN2438



DSCN2439



DSCN2441



DSCN2440



DSCN2442



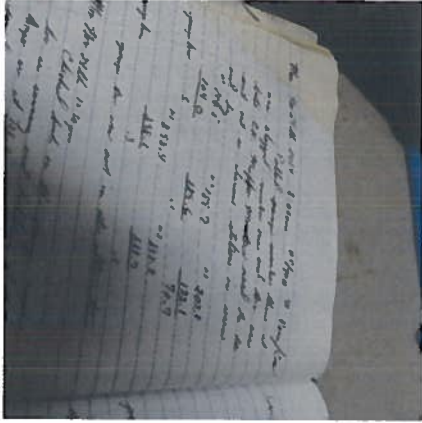
DSCN2443



DSCN2445



DSCN2444



DSCN2446



DSCN2447



DSCN2448



DSCN2449

Att. 2

STA. No.	STATION NAME	PHONE No.
1	BAMBERGERS	(732) 321-9368
2	BARTHA ✓?	(732) 339-0938
3	BEAVER ✓?	(908) 757-0154
4	BRUNSWICK AVE	(732) 339-1571
5	DOGWOOD	(908) 754-1488
6	EASTSIDE ✓	(732) 548-0202
7	ENGEL APTS. ✓	(732) 635-0043
8	FAITH FELLOWSHIP ✓	(908) 226-5549
9	HEIGHTS ✓	(732) 417-0001
10	MARINA GARDENS ✓	(732) 339-9667
11	METUCHEN ✓	(732) 452-1654
12	MILL BROOK ✓	(732) 339-9668
13	NATIONAL ROAD ?	(732) 287-1801
14	OXFORD	(732) 574-1073
15	PED ✓	(732) 635-0129
16	PROGRESS	(908) 754-0950
17	TINGLEY LANE	(908) 754-1253
18	WEST SIDE ✓	(732) 548-9340
19	WOOD AVE ?	(732) 574-0985
20	WOODBROOK	(732) 635-0134

21

HAYDOK

new 2017

908-561-965

SANITARY SEWER PUMP STATION DATA

STATION NAME	STATION LOCATION	BLOCK	LOT	STATION DESCRIPTION	PUMP DESCRIPTION	SUCTION PIPE DIA.		DISCHARGE PIPE DIA.		GENERATOR	G.P.M.	T.D.H.	IMPELLER DIAMETER	PUMP ROTATION				H.P.	R.P.M.	PHASE	CYCLE	VOLTS	ALARM SYSTEM	ALARM TYPE	ALARM NOTIFEE	BYPASS SIZE	FLOWMETER	YEAR BUILT	ENGINEERING DRAWING NO.	REMARKS
						#1	#2	#3	#4					#1	#2	#3	#4													
BAMBERGERS	LAFAYETTE DR	690	35	CAN STATION SERIAL No. 884	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	6"	6"			NONE	500	71'	10"	CW	CCW	NONE	NONE	30	1750	3	60/240	Y	FLOAT	POLICE	N	1957				
BARTHA	AULD WAY	903	1	WETWELL STATION SERIAL No. 66-2027	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	4"	4"			NONE	150	57'	7-7/8"	CW	CW	NONE	NONE	7.5		3	60/240	Y	FLOAT	POLICE	N	1977	1800	UPDATED 1991		
BEAVER	BEAVER AVE	433-A	60	CAN STATION SERIAL No. 07-3902	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	6"	6" to 8"			NONE	330	60'	11-7/8"	CW	CCW	NONE	NONE	15	1170	3	60/240	Y	FLOAT	POLICE	N	1971				
BRUNSWICK AVE	BRUNSWICK AVE	4	2-R-3	CAN STATION SERIAL No. 2813	TYPE-SMTH & LOWLESS MODEL No. 604 SERIAL No.	10"	10" to 12"			NONE	2000	63'		CW	CCW	NONE	NONE	50	1150	3	60/480	Y	FLOAT	POLICE	N	1964	945			
DOGWOOD	TEABERRY DRIVE	425	62	CAN STATION SERIAL No. 12-7092-E	TYPE-SMTH & LOWLESS MODEL No. 1034 SERIAL No.	14" to 10"	10" to 14"			TYPE-CAT SIZE-370 KW FUEL - DIESEL	2150	60'		CW	CW	CW	NONE	100	1800	3	60/460	Y	FLOAT	POLICE	N	1980	1424			
EASTSIDE	No. EVERGREEN RD	677	2-A	DRYWELL STATION	TYPE-CORRELL MODEL No. SERIAL No.	8"	8" to 20"			TYPE-CAT SIZE-700 KW FUEL - DIESEL				CW	CW	CW	NONE	200	1790	3	60/480	Y	FLOAT	POLICE	8"	Y	1967		UPDATED 1999	
ENGEL APTS.	WILLARD DUNHAM DR	265-D-27-E		CAN EJECTOR STATION SERIAL No.	TYPE-NONLINE SANDERSON MODEL No. SERIAL No.	4"	4"			TYPE-CHAM SIZE-FUEL-PROPANE	100	26'		NONE	NONE	NONE	NONE	2		3	60/240	Y	FLOAT	POLICE	N	1974				
FAITHFELLOWSHIP	OAK TREE ROAD	555	1	WETWELL STATION SERIAL No. 15-2135	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	4"	4"			NONE				CCW	CW	NONE	NONE	3		1	60/220	Y	FLOAT	POLICE	N	1971				
HEIGHTS	HARMON ROAD	694	2-B	CAN STATION SERIAL No. 834	TYPE-SMTH & LOWLESS MODEL No. SERIAL No.	4"	4" to 6"			TYPE-CHAM SIZE-25 KW FUEL - GAS	250	84'		CW	CCW	NONE	NONE	15	1750	3	60/240	Y	FLOAT	POLICE	N	1959				
MARINA GARDENS	MARINA DRIVE	302	2-B	CAN STATION	TYPE-NONLINE SANDERSON MODEL No. SERIAL No.	8"	8"			NONE	535	120'		CW	CCW	NONE	NONE	30	1800	3	60/240	Y	FLOAT	POLICE	N	1973	786			
METUCHEN	JERSEY AVENUE (LOCATED IN METUCHEN)	0	0	DRYWELL STATION	TYPE-FARBANKS MORSE MODEL No. F-13308 SERIAL No.	6" to 4"	4" to 8"			NONE				CCW	CCW	CCW	NONE	7.5		3	60/208	Y	FLOAT	POLICE	6"	N	1955	934		
MILLBROOK (FORDS)	WOODBIDGE AVE	265-DD	50-X	DRYWELL STATION SERIAL No. 80-2182	TYPE-ABS SUBMERSIBLE MODEL No. SERIAL No.	8"	8"			TYPE-CUMMINS SIZE-450KW FUEL - DIESEL	1500	182'	11-3/8"	CW	CW	NONE	NONE	177		3	60/460	Y	FLOAT	POLICE	8"	N	1948			
NATIONAL ROAD	NATIONAL ROAD	50	13	WETWELL STATION SERIAL No.	TYPE-ALIGHT MODEL No. 07321-375 SERIAL No.	8"	8"			TYPE-CAT SIZE-300KW FUEL - DIESEL	2800	117'		CW	CW	CW	NONE	150		3	60/480	Y	FLOAT	POLICE	8"	Y	1963		UPDATED 1999	
OXFORD	OXFORD ROAD	989	12	CAN STATION SERIAL No. 3746	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	6" to 4"	4" to 6"			NONE	330	117'	11"	CW	CCW	NONE	NONE	25	1760	3	60/240	Y	FLOAT	POLICE	N	1966				
PED REALTY	KOSTER BLVD	689	2-B-1	CAN STATION SERIAL No. 2497	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	10"	10"			NONE	1350	9.5'	10-5/8"	CW	CCW	NONE	NONE	50	1750	3	60/480	Y	FLOAT	POLICE	N	1963				
PROGRESS	PROGRESS STREET	412	5-P-3	CAN STATION SERIAL No. 12-7090-E	TYPE-SMTH & LOWLESS MODEL No. 464C SERIAL No.	12"	12"			TYPE-CAT SIZE-180KW FUEL - DIESEL	1581	74'	14-3/4"	CCW	CCW	CCW	NONE	40	1170	3	60/460	Y	FLOAT	POLICE	N	1980				
TINGLEY LANE	TINGLEY LANE	426	5-B-3	CAN STATION SERIAL No. 12-7091-E	TYPE-SMTH & LOWLESS MODEL No. 464C SERIAL No.	12"	12"			TYPE-CAT SIZE-180KW FUEL - DIESEL	2417	58'	15"	CCW	CCW	CCW	NONE	50	1170	3	60/460	Y	FLOAT	POLICE	N	1967	1424			
WEST SIDE	PRESTWICK WAY	594-B	3	DRYWELL STATION	TYPE-CORRELL MODEL No. SERIAL No.	10"	10" to 20"			TYPE-CUMMINS SIZE-300KW FUEL - DIESEL	2900	57'		CW	CW	CW	CW	100	890	3	60/480	Y	FLOAT	POLICE	N	1967	1424	UPDATED 1999		
WOOD AVE.	WOOD AVENUE	498	31	CAN STATION SERIAL No. 3748	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	6" to 4"	4" to 8"			NONE	1000	104'		CW	CCW	NONE	NONE	40		3	60/240	Y	FLOAT	POLICE	N	1966				
WOODBROOK	WOODBURY ROAD	R.O.W.		WETWELL STATION SERIAL No. 14-1215-W	TYPE-SMTH & LOWLESS MODEL No. 4628 SERIAL No.	4"	4"			NONE	200	26.5'		CW	CCW	NONE	NONE	3		3	60/230	Y	FLOAT	POLICE	N	1983				

1777.3

**New Jersey Department of Environmental Protection
Water Compliance and Enforcement
NOTICE OF VIOLATION**

File #

PI #

96151

Site Name: Edison Twp. Site Address: 100 Municipal Blvd.
Municipality: Edison Block: Lot: County: Middlesex Zip: 08817
Property Owner: Prop. Owner's Address: Phone:
Responsible Entity (if other than Property Owner): R.E. Address:
R.E. City: State: Zip: Phone:

On 10/27/14 a representative from the NJDEP Water Compliance and Enforcement (W C&E) conducted an investigation into this site/matter. This **NOTICE** is issued based on facts observed by or known to the Department's representative issuing this **NOTICE**, to warn you that a violation(s) of the Statutes and Rules checked below has been found:

- ☒ New Jersey Water Pollution Control Act, N.J.S.A. 58:10A-1 et seq.
☒ New Jersey Safe Drinking Water Act, N.J.S.A. 58:12A-1 et seq.
☒ New Jersey Water Supply Management Act, N.J.S.A. 58:1A-1 et seq.
☒ New Jersey Water Supply and Waste Operators Licensing Act, N.J.S.A. 58:11-64 et seq.

EXPLANATION OF THIS NOTICE - Violations with citation(s) to the specific Rules issued under the above checked Statutes:

(1) Failure to obtain a physical Connection Permit for the Maria Gaudin PS. (2) Failure to provide screening of raw sewage at the Church Tangle Ln, Progress, and Daywood PS.
(3) Failure to secure the Tangle Ln, Progress, and Daywood PS. (4) Failure to provide adequate pumping at the Daywood PS and Daywood PS. (5) Failure to submit report after incidents.

- ☐ Violation above corrected at time of issuance ☐ See additional (#) pages of **EXPLANATION OF THIS NOTICE**

PURPOSE OF THIS NOTICE - This is intended to serve as a **NOTICE** to you, to warn you of the above violations, in order to 1) provide you with an opportunity to voluntarily investigate the matter and, voluntarily take corrective action to address the identified violation(s) and 2) identify those violations, and time periods, pursuant to the Grace Period Law, N.J.S.A. 13:1D-125 et seq. where your voluntary action can prevent formal enforcement orders and penalties issued by the Department (see violations marked with an asterisk above *). This **NOTICE** does not constitute a formal enforcement order, a final agency action or a final legal determination that a violation has occurred. Therefore, this **NOTICE** may not be appealed or contested.

Neither the issuance of this **NOTICE** nor any corrective actions taken by you to address the violation(s) cited, precludes the State of New Jersey or any of its agencies from initiating future enforcement action (including issuance of a formal enforcement order and the assessment of penalties) with respect to the violations listed above or for any other violations. In the event the Department determines to pursue future formal enforcement action, you will then be provided with an opportunity to appeal or contest such action.

RESPONDING TO THIS NOTICE - Voluntary corrective actions taken in response to this **NOTICE** can affect the Department's determination on the need for or severity of any potential future enforcement action in this matter. In accordance with the Grace Period Law, the Department will not assess a penalty against you for the violations marked with an asterisk * above, if you take voluntary action to address and correct these violations at the time of issuance, or within the time periods indicated in this **NOTICE**. For violations identified in this **NOTICE** that are not subject to the Grace Period Law, the Department may consider any voluntary actions you take in response to this **NOTICE** as part of its determination 1) on whether to initiate future formal enforcement action for this site/matter and, 2) on the amount of any penalty that may be assessed in future enforcement actions. Please see items checked below regarding actions you may voluntarily undertake to address violations identified in this **NOTICE**:

CORRECTIVE ACTION PAGE(S) - The Corrective Action Page(s) outlines the timeframes pursuant to the Grace Period Law during which you may voluntarily take action to come into compliance. Depending on the nature of violations cited in this **NOTICE**, corrective action or compliance assistance recommendations for violations that are not subject to the Grace Period Law may also be outlined on this form

- ☐ Not Provided for this Notice
☐ See additional (#) attached pages

COMPLIANCE RESPONSE FORM - Submission of a Compliance Response Form if checked below is voluntary. Completed forms should be sent to the Department contact indicated at the bottom of this **NOTICE**.

- ☐ Not Applicable
☐ If received within days of receipt it will preserve your protection from penalty under Grace Period Law.
☒ If received within 5 days of receipt, it will be considered in potential future Department action regarding the violations cited

FOR QUESTIONS REGARDING THIS NOTICE, please contact the Department representative issuing this **NOTICE** at the location indicated:

<input type="checkbox"/> Southern Water Enforcement 2 Riverside Drive, Suite 201 Camden, New Jersey 08103 Telephone: (856) 614-3655 Fax: (856) 614-3608	<input type="checkbox"/> Northern Water Enforcement 7 Ridgedale Ave. Cedar Knolls, NJ 07927 Telephone: (973) 656-4099 Fax: (973) 656-4400	<input checked="" type="checkbox"/> Central Water Enforcement PO Box 420 - Mailcode 44-03 Trenton, NJ 08625-0420 Telephone: (609) 292-3010 Fax: (609) 292-6450
---	---	--

Issued by: Monica Rotondo Date: 10/28/14 Signature: [Signature]

Received by (print): Thomas J. Hynes Date: 10/29/14 Signature (receipt only): [Signature]

NJDEP Use Only: ☐ Certified Mail Date Mailed Article Number

ATTACHMENT 4

Spill Reports related to the Sanitary Sewer System from NJDEP Data Miner for the period
November 19, 2009 to the Present March 3, 2014

http://datamine2.state.nj.us/DEP_OPRA/OpraMain/get_long_report?

1/13/10, 3/4/10, 7/29/10, 4/29/11, 5/19/11, 6/20/11, 10/16/14

Incident ID Number: 338514 **Communications Center Number:** 10-01-13-1531-11
371719
Received Date: 1/13/2010
Incident Description: REPORTING A SEWAGE MAIN BREAK. CLEANUP/REPAIRS ARE IN PROGRESS.
Incident Type Program: Water Quality
Incident Type: Sewage
Follow-up Status:
Program Interest Name:
Program Interest ID:
Most Recent Compliance Evaluation: **Most Recent Enforcement Action:**

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
338310	Communication Center	Sewage	Closed, No Inv.

Incident ID Number: 341941 **Communications Center Number:** 10-03-04-1618-23
Received Date: 3/4/2010
Incident Description: SEWAGE SPILL IS DUE TO A BROKEN SEWAGE LATERAL. CLEANUP PENDING
Incident Type Program: Water Quality
Incident Type: Sewage
Follow-up Status:
Program Interest Name:
Program Interest ID:
Most Recent Compliance Evaluation: **Most Recent Enforcement Action:**

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
341936	Communication Center	Sewage	Closed, Inv-w/riol

Incident ID Number: 360551

Communications Center Number: 10-07-29-1433-51

Received Date: 7/29/2010

Incident Description: SANITARY SEWER DISCHARGE .

Incident Type Program: Water Quality

Incident Type: Sewage

Follow-up Status:

Program Interest Name:

Program Interest ID:

**Most Recent Compliance
Evaluation:**

**Most Recent
Enforcement Action:**

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
360528	Communication Center	Sewage	Closed, No Inv.

Incident ID Number:

Communications Center Number: 11-04-29-1100-23

Received Date: 4/29/2011

Incident Description: SUSPECT LIFT STATION MALFUNCTION CAUSING SPILL ONTO PARKING LOT. NO CLEAN UP IN PROGRESS.

Incident Type Program:

Incident Type: Sewage

Follow-up Status:

Program Interest Name:

Program Interest ID:

Most Recent Compliance
Evaluation:

Most Recent
Enforcement Action:

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
384942	Communication Center	Sewage	

Incident ID Number: 387106

Communications Center Number: 11-05-19-1413-51

Received Date: 5/19/2011

Incident Description: PUMP STATION FAILURE CAUSED MANHOLE OVERFLOW. TERMINATED AT 12:00

Incident Type Program: Water Quality

Incident Type: Sewage

Follow-up Status:

Program Interest Name:

Program Interest ID:

Most Recent Compliance
Evaluation:

Most Recent
Enforcement Action:

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
387097	Communication Center	Sewage	Closed, Inv-no viol

Incident ID Number:	390836	Communications Center Number:	11-06-20-0940-01
Received Date:	6/20/2011		
Incident Description:	MECHANICAL FAILURE ON A PUMP CAUSED SEWAGE TO SPILL . CLEAN UP AND REPAIRS IN PROGRESS.		
Incident Type Program:	Water Quality		
Incident Type:	Sewage		
Follow-up Status:			
Program Interest Name:			
Program Interest ID:			
Most Recent Compliance Evaluation:	Most Recent Enforcement Action:		

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
390736	Communication Center	Sewage	Closed, Inv-no viol

Incident ID Number:	535450	Communications Center Number:	14-10-06-1350-46
Received Date:	10/6/2014		
Incident Description:	MANHOLE OVER FLOWED CAUSING SPILL . CLEAN UP COMPLETE.		
Incident Type Program:	Water Quality		
Incident Type:	Sewage		
Follow-up Status:			
Program Interest Name:			
Program Interest ID:			
Most Recent Compliance Evaluation:	Most Recent Enforcement Action:		

Linked Incidents	Linked Incident Program	Linked Incident Type	Followup Status
535408	Communication Center	Sewage	Closed, Inv-no viol

HH.S.
CORRECTED COPY DATE 12-5-14

COLLECTION SYSTEM MONTHLY REPORT

Agency: _____
Reporting Period: JANUARY 1 to 31 2014
Licensed Operator of Record: _____
Total feet of sewer line operated & maintained _____ ft

Section 1 - Collection System Maintenance

1. Feet of Sewer Line Cleaned: 43,700
2. Feet of Sewer Line Televised: _____
3. Other collection System Preventive Maintenance
(ex manhole repair, easement clearing, etc.): _____

4. Blockages:
Total Blockages: 20 Main Blockages: 5 Lateral Blockages: 15

5. Sanitary Sewer Overflows (SSO's): Attach copy of report sent to NJDEP

DATE	NJDEP HOTLINE #	SSO AMOUNT

6. Odor Complaints: _____

7. New Connection: _____
TWA Required: _____

ADDRESS	BLOCK	LOT(S)	GPD

COLLECTION SYSTEM MONTHLY REPORT

Agency: Edison Township Public Works
 Reporting Period: JANUARY 1 to 31 2014
 Licensed Operator of Record: Barry E Miller
 Total feet of sewer line operated & maintained 2,090,880 #

Section 1 - Collection System Maintenance

1. Feet of Sewer Line Cleaned: 38,700
 2. Feet of Sewer Line Televised: 150
 3. Other collection System Preventive Maintenance
 (ex: manhole repair, easement clearing, etc.):
Root control cutting 150' added rain cover to
manholes. cleared easements. Scraped and Vitrified
wet wells. Hooked all bar screens in use to stations.

4. Blockages: 14 Main Blockages: 2 Lateral Blockages: 12

5. Sanitary Sewer Overflows (SSO's): Attach copy of report sent to NJDEP

DATE	NJDEP HOTLINE #	SSO AMOUNT

6. Odor Complaints: N/A 0

7. New Connection:

TWA Required:

ADDRESS	BLOCK	LOT(S)	GPD

Non TWA Required: Commercial, Multi Family

ADDRESS	BLOCK & LOT	USE	GPD	DATE CONNECTED

Single Family Connections:

ADDRESS	BLOCK	LOT(S)	DATE CONNECTED

Section 2 - Pump Station Maintenance

1: List any Non Preventative Maintenance Activities (unscheduled, Alarms, Emergencies):

PS#	PROBLEM & REPAIR/MAINTENANCE/CORRECTIVE ACTION MADE
6	Pump Malfunction: tripped breaker - re-set
11	H/L wet well: float adjustment
7	H/L wet well: tripped motor breaker - re-set
6	#1 V.F. 17. Failure - re-set panel

2. List any Major Equipment (pumps, Motors, etc.) Out of Service during the month:

PS#	EQUIPMENT NAME	OUT OF SERVICE DATE	BACK IN SERVICE DATE OR (EST. DATE)
17	#2 pump	check valve	needs replacement
5	#3 pump	suction valve	needs replacement
19	#2 pump	DEC 2003	1/31 replaced

3. Industrial/Commercial Discharges*

List the additions/deletions to the initial list of industrial/commercial discharges:

ADDITIONS	DATE	DELETIONS	DATE

☐ Check if no Addition/Deletions in this report period.

Licensed Operator

Benny F. Miller

Print Name

B. F. Miller

Signature

2/26/14
Date

*First Report due 2/10/98 should include the initial list of Industrial Commercial Dischargers.

Att 6 4/3

Municipality and the City of Plainfield and the Boroughs of North Plainfield and Dunellen, shall pay their proportionate share of any and all grant moneys received by the Authority from the EPA, allocable to the use of the Trunk System from such users in accordance with the industrial cost recovery provisions of EPA regulations as applicable from time to time. Each Company hereby agrees that it will make all such required payments to the Authority or the Municipality, as the case may be. Each Municipality and the City of Plainfield and the Boroughs of North Plainfield and Dunellen agree to require all industries within their respective jurisdictions to make the required payments to them, and all amounts so received shall be paid over to the Authority.

"(H) *Sewer Use Ordinance.* The Authority, each Municipality, and all public corporations not parties to this Agreement delivering sewage for discharge and treatment into the Local Sewerage System of any Municipality or Joint Meeting, shall secure passage of a sewer use ordinance or resolution, as the case may be, in accordance with the rules and regulations of the EPA. Said ordinance or resolution shall provide for (1) the industrial cost recovery charges; (2) pre-treatment standards for the industries served by the Municipalities or public corporations; (3) user charges; (4) control of infiltration-inflow and (5) requirements that new sewers and connections within the Local Sewerage System are properly designed and constructed, in accordance with Article VI (C) of the Service Contract, dated February 5, 1954. Notwithstanding the foregoing or any other provisions of this Agreement, each Municipality or corporation as hereinbefore referred to, to the extent permitted by EPA regulations and Federal law may raise the necessary funds or sewage treatment through the imposition of the general ad valorem real property taxes in lieu of a schedule of user charges.

"(I) *Infiltration/Inflow.* Each Municipality and all public corporations discharging sewage into the Local Sewerage System of a Municipality will maintain its Local Sewerage System in such a manner as to exclude any excessive infiltration and/or inflow from entering into the Local Sewerage System. If excessive infiltration and/or inflow exists or occurs, the Municipality and public corporation will effect such repairs, or other measures, so as to eliminate the excessive infiltration inflow to normally allowable limits which are acceptable to the DEP and/or the EPA. Furthermore, if as a result of a sewer evaluation survey, rehabilitation work is shown to be required, each Municipality and public corporation will perform such work as may be necessary to rehabilitate its Local Sewerage System.

"(J) *Local Systems.* Each Municipality and/or the City of Plainfield, the Borough of North Plainfield, and the Borough of Dunellen, acting in Joint Meeting, at its own cost and expense will construct, install and operate any and all necessary Local Sewerage Systems and extensions thereto necessary to cause the same to reach to and deliver sewage at the point or points of connection to the Trunk System, and each public corporation discharging sewage into the Local Sewerage System of a municipality shall at its own cost and expense construct, install, and operate any and